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*Counsel for Defendant Meta Platforms, Inc.  
(formerly known as Defendant Facebook, Inc.)*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on  
behalf of all other similarly situated,

Plaintiffs,

v.

FLO HEALTH, INC., et al.,

Defendants.

CASE NO. 3:21-cv-00757-JD

**STIPULATION AND [PROPOSED] ORDER  
CONTINUING REMEDY HEARING**

(Civil L.R. 6-1, 6-2, 7-12)

Hon. James Donato

1 Plaintiffs Sarah Wellman, Jennifer Chen, and Tesha Gamino (“Plaintiffs”) and Defendant  
 2 Meta Platforms, Inc. (“Meta,” and collectively with Plaintiffs, the “Parties”), by and through their  
 3 undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter  
 4 the below Order approving this Stipulation.

5 **WHEREAS**, on August 4, 2025, the jury reached a verdict in favor of Plaintiffs (Dkt. 756);

6 **WHEREAS**, on August 27, 2025, the Court set a remedy hearing for October 2, 2025, and  
 7 required the Parties to file a joint proposal for statutory damages to be awarded, a claims procedure,  
 8 and injunctive relief as warranted (the “Joint Proposal”) by September 25, 2025 (Dkt. 770);

9 **WHEREAS**, the Yom Kippur holiday begins at sundown on October 1, 2025, and ends at  
 10 sundown on October 2, 2025, and therefore conflicts with the scheduled hearing;

11 **WHEREAS**, counsel for the Parties have conferred and respectfully submit that, because  
 12 multiple counsel and client representatives observe Yom Kippur, good cause exists to continue the  
 13 remedy hearing;

14 **WHEREAS**, counsel for the Parties further agree that additional time to work together  
 15 regarding the Joint Proposal would be beneficial, such that the Parties can narrow any disputes as  
 16 much as possible;

17 IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the  
 18 Parties, that:

- 19 1. The Parties shall file the Joint Proposal no later than October 23, 2025; and
- 20 2. The remedy hearing shall be continued to October 30, 2025 at 10:00 a.m.

21  
 22 Dated: September 10, 2025

Respectfully submitted,

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 24 LATHAM & WATKINS LLP

25 By /s/ Melanie M. Blunschi  
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*Counsel for Plaintiffs Leah Ridgway and Autumn  
Meigs*

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

\_\_\_\_\_  
Hon. James Donato  
United States District Judge

**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Continuing Remedy Hearing. Pursuant to L.R. 5-1(i)(3) regarding signatures, I, Melanie M. Blunschi, attest that concurrence in the filing of this document has been obtained.

DATED: September 10, 2025

/s/ Melanie M. Blunschi  
Melanie M. Blunschi